

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**U.S. SECURITIES AND EXCHANGE  
COMMISSION,**

*Plaintiff,*

**vs.**

**VUUZLE MEDIA CORP., VUUZLE  
MEDIA CORP. LIMITED,  
RONALD SHANE FLYNN, and  
RICHARD MARCHITTO,**

*Defendants,*

**-and-**

**VUMU MUSIC LLC,**

*Relief Defendant.*

**Civil Action No. 2:21-cv-1226 (KSH)  
(CLW)**

**REQUEST TO THE CLERK OF COURT FOR ENTRY OF DEFAULT**

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiff Securities and Exchange Commission (“SEC”) hereby requests the Clerk of Court to enter defaults against each of the following defendants and relief defendant in this case:

1. Defendant Ronald Shane Flynn
2. Defendant Vuuzle Media Corp., Limited
3. Defendant Richard Marchitto
4. Relief Defendant Vumu Music LLC

The accompanying declaration of Daniel J. Maher is submitted in support of this application.

Dated: May 16, 2022

Respectfully submitted,

/s/ Daniel J. Maher

Devon Staren

Daniel J. Maher

Attorneys for Plaintiff

U.S. Securities and Exchange  
Commission

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### **CERTIFICATE OF SERVICE**

I hereby certify that on May 16, 2022, I served a copy of the foregoing upon all counsel of record using this Court's ECF system, upon Defendant Flynn using the email [rflynn48@gmail.com](mailto:rflynn48@gmail.com), and upon Defendant Vuuzle Media Corp. Limited and Relief Defendant Vumu Music LLC via their control person Ronald Shane Flynn at the email [rflynn48@gmail.com](mailto:rflynn48@gmail.com).

/s/ *Devon L. Staren*  
Counsel for Plaintiff